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Attorneys for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability MDL NO. 15-02641-PHX-DGC
Litigation

This Document Relates to:

DORIS JONES,

Plaintiff,

v.

Case No. CV-16-00782-PHX-DGC

C. R. BARD, INC., a New Jersey
Corporation; AND BARD PERIPHERAL
VASCULAR INC., an Arizona
Corporation,

DEFENDANTS' PROPOSED FORM

Defendants.

In accordance with the Case Management Order No. 28 [Doc. 8871], Defendants
hereby submit their proposed Verdict Form.

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DATED this 1st day of May, 2018.

s/Richard B. North, Jr.
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**Attorney for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 1, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to all counsel of record.

s/Richard B. North, Jr.
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We, the jury empaneled and sworn in the above action, upon our oaths, find as follows:

A. LIABILITY

1. Strict Product Liability Design Defect Claim

Do you find by a preponderance of the evidence that Bard is liable to Ms. Jones on the strict liability design defect claim? _____ Yes _____ No

2. Strict Product Liability Failure to Warn Claim

Do you find by a preponderance of the evidence that Bard is liable to Ms. Jones on the strict liability failure to warn claim? _____ Yes _____ No

3. Negligent Design Claim

Do you find by a preponderance of the evidence that Bard is liable to Ms. Jones on the negligent design claim? _____ Yes _____ No

4. Negligent Failure to Warn Claim

Do you find by a preponderance of the evidence that Bard is liable to Ms. Jones on the negligent failure to warn claim? _____ Yes _____ No

If you answered “No” to each question in Part A, do not complete Parts B or C. If you answered “Yes” to any question in Part A, please complete Parts B and C.

B. COMPENSATORY DAMAGES

If you found Bard liable on any of the claims set forth above, what amount of damages do you find will reasonably compensate Ms. Jones for her injuries?

\$ _____

C. PUNITIVE DAMAGES

Do you find by clear and convincing evidence that punitive damages should be awarded against Bard? _____ Yes _____ No

Presiding Juror Number

Date